Direct Testimony

of

William R. Johnson

Water Department

Financial Analysis Division

Illinois Commerce Commission

Apple Canyon Utility Company

Docket No. 03-0399

August 28, 2003

1 WITNESS IDENTIFICATION

- 2 Q. Please state your name, your employer, and your business address.
- 3 A. My name is William R. Johnson. I am employed by the Illinois Commerce
- 4 Commission ("Commission"). My business address is 527 East Capitol Avenue,
- 5 Springfield, Illinois 62701.

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- 7 Q. How long have you been employed by the Commission?
- 8 A. I have been employed by the Commission since September 1, 1994.

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- 10 Q. Please briefly state your qualifications.
- 11 A. I received a Bachelor of Arts degree in Economics from Sangamon State
- 12 University (now University of Illinois at Springfield) in May 1990 and a Master of
- Arts degree in Economics, also from Sangamon State University, in December
- 14 1993.

- In September 1994, I was assigned to the Commission's Public Utilities Division
- as an Economic Analyst for the Rates Department. In that capacity I reviewed
- and analyzed filings by electric, gas, and water utilities with regard to cost of
- service and rate design. I made recommendations to the Commission on such
- filings and participated in docketed proceedings as assigned. In January 2000, I
- 21 was reassigned to the Water Department of the Financial Analysis Division. My
- duties include 1) evaluating rate filings; 2) assisting the Consumer Services
- 23 Division in handling inquiries and complaints, upon request; 3) evaluating

testimony presented by utilities: 4) testifying on behalf of Commission Staff 24 ("Staff") in rate proceedings, applications for certificates, applications for 25 reorganizations, and other formal proceedings which contain water and/or sewer 26 related issues; 5) reviewing and performing cost-of-service studies; and 6) 27 reviewing rate design issues. 28 29 Have you previously testified before the Commission? Q. 30 Yes, I have previously testified before the Commission on numerous issues A. 31 related to my duties. 32 33 **PURPOSE OF TESTIMONY** 34 What is the purpose of your testimony? 35 Q. The purpose of my testimony is to address Apple Canyon Utility Company's 36 Α. 37 ("Apple Canyon" or "Company") filing for a general increase in rates. I will be presenting testimony and exhibits concerning rate design issues. I will also 38

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tariff issues.

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Q. Are you making any recommendations concerning the appropriateness of the total annual revenue requirement for the Company in this proceeding?

testify to the proposed test year billing units, as well as, proposed miscellaneous

No, I am not. My testimony is directed toward the review of the proposed tariffs (and underlying support) filed by the Company to recover the revenue requirement deemed appropriate in this proceeding.

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48	Q.	Please describe how your direct testimony is organized.
49	A.	My direct testimony is arranged into three sections. Section 1 is a review and
50	•	discussion of total proforma revenues and test year billing units ending
51		December 31, 2002. Section II addresses Staff's and the Company's rate
52		design proposals, and Section III discusses miscellaneous tariff issues.
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54	Q.	Have you attached any schedules to your testimony?
55	A.	Yes, I have attached the following schedules:
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57		Schedule 3.1 – Plant in Service and Operation & Maintenance accounts
58		necessary for performing cost of service study
59		Schedule 3.2 – Company Present and Proposed Rates & Revenues, and
60		Staff Proposed Rates & Revenues
61		Schedule 3.3 – Typical Bill Comparison
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63	Q.	Please describe Apple Canyon Utility Company.
64	A.	Apple Canyon is a wholly owned subsidiary of Utilities, Inc. ("UI") that owns 24
65		water and wastewater utilities in Illinois. Water Service Corporation ("WSC")
66		manages the operation for all of UI's water and wastewater systems, including
67		Apple Canyon. WSC provides management, administration, engineering,

accounting, billing, data processing, and regulatory services for the utility

systems. (Ross, Direct Testimony, p. 1)

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Apple Canyon is a recreational lake development located approximately eight miles north of Woodbine in JoDaviess County. Apple Canyon provides water usage service to approximately 735 customers and availability service to approximately 1,951 customers (Ross, Direct Testimony, p. 2).

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I. TOTAL REVENUES AND TEST YEAR BILLING UNITS

- 77 Q. Did you review the Company's exhibits, workpapers, and data request 78 responses concerning proforma revenues?
- 79 A. Yes, I did.

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- Q. Has the Company identified Miscellaneous Operating Revenues for the test year?
- Yes, the Company has identified, in response to Staff data request WRJ 1.05, a 83 total of \$2,288 in Miscellaneous Operating Revenues for the test year. The 84 Company's response identified Miscellaneous Operating Revenues consisting of 85 \$1,445 in Forfeited Discounts, \$450 in New Customer Charges, \$14 in Non-86 Sufficient Funds ("NSF") Check Charges, and \$379 in Miscellaneous Revenues. 87 However, in response to Staff Data Request WRJ 1.06 the Company identified a 88 dollar amount for late payment charges of \$51.30 that did not seem to be 89 identified in the response to Staff data request WRJ 1.05. 90

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Q. Has the Company provided any evidence to explain this discrepancy?

93	A.	Yes, in a phone conversation with Company witness Ross, she stated that
94		forfeited discounts are late payment fees. Therefore, the Forfeited Discount
95		figure of \$1,445 represents the full amount of Late Payment Charges collected
96		by the Company for the test year including the \$51.30.
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98	Q.	Do you have any adjustments to revenues because of your review?
99	A.	Yes, I have adjusted Miscellaneous Operating Revenues.
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101		Late payment charges are 1½ % of a customer's total bill. Therefore, if the
102		Company's rates increase, Late Payment Charge revenues will also increase. I
103		adjusted Late Payment Charges to reflect approximately the same number of
04		customers paying their bills after the due date, but at the Company's present and
105		proposed rates and Staff's proposed rates.
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107		I have also adjusted the NSF Check Charge. As discussed later in my
801		testimony, I propose to increase the NSF Check Charge from \$7 to \$10.
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10		Additionally, I have adjusted the revenues associated with Outside Meter
111		Readers. As discussed later in my testimony, I propose to include an additional
12		\$80 in Miscellaneous Revenues to account for future outside meter requests.
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114		Miscellaneous Operating Revenues can be found on ICC Staff Exhibit 3.0,
115		Schedule 3.2.

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117	Q.	What test year usage levels and billing units is the Company proposing to
118		use in this case?
119	A.	The Company is proposing to use year ending December 2002 usage levels and
120		billing units for the test year. (Ross Direct Testimony, p. 2, line 31)
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122	Q.	Do you have any adjustments to the Company's proposed proforma test
123		year usage levels and billing units?
124	A.	No. I have examined the Company's proposed usage levels and billing units and
125		concur with their proposal.
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127	11.	RATE DESIGN
128	Q.	Please explain how the Company's proposed charges were determined.
129	A.	The Company stated in response to WRJ 1.10 that once revenues were
130		determined, the regulatory department attempted to devise reasonable base
131		charges based on a percentage of consumption and billing units.
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133	Q.	Do you agree with the Company's rate design proposal?
134	Α.	No. There is no accompanying justification, cost or otherwise.
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136	Q.	Does this lack of cost support present a problem?

137	A.	Yes. The Commission has a longstanding objective of basing rates on costs.
138		The lack of a cost foundation means that the Company's proposal falls short of
139		this objective.
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141	Q.	How would Staff normally address the Company's failure to base its
142		proposed rates on costs?
143	A.	The normal response would be for Staff to develop an alternative cost of service
144		("COS") study to use as a foundation for deriving cost-based rates.
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146	Q.	Is such an approach possible in this proceeding?
147	A.	No, it is not.
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149	Q.	Please explain.
150	A.	The Company has provided insufficient data to develop such a study. Staff's
151		water COS study requires detailed cost and plant information in order to
152		generate rates that are considered cost based. To secure that information, Staff
153		sent a data request to the Company (WRJ 1.08) that identified specific
154		categories, which would enable Staff to perform a COS study. The Company did
155		respond to Staff's data request by providing information, but the information was
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		respond to Staff's data request by providing information, but the information was
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figure, Staff asked the Company to identify the level of Customer Account expenses in response to data request WRJ 1.08. In its response, the Company failed to identify Customer Account expenses. Staff disputes this response, given that the Company incurs expenses such as postage, paper, labor and related costs in maintaining customer accounts. Thus, acceptance of the Company would clearly undermine the accuracy of Staff's cost of service study. Further, there is no support on the record for using an alternative Customer Accounts figure. This lack of data serves to further undermine Staff's effort to develop a cost of service study for the Company.

Additional questions arise concerning other account data provided by the Company for Staff's cost of service study. The Company identified \$299,623 of Plant in Service costs associated with services. However, it did not attribute any Operation and Maintenance expenses to those services. This unrealistically assumes that a significant component does not require any additional expenditure to be operated or maintained. In addition, no expenses were identified for Transmission and Distribution related supervision, hydrants, and storage. While it is possible that the Company may not have expended costs in some of these categories since the last rate case, the possibility that there were no expenditures in all the categories mentioned is highly unlikely.

The more likely explanation is that the Company does not have the kind of reliable, specific information necessary to perform a cost of service study. This

conclusion is supported by a phone conversation with Company witness Ross, who indicated that the Company does not keep the detailed type of records Staff needs for its COS study.

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- Q. Do you have any recommendations to the Commission to improve the quality of the cost data provided by the Company in future rate cases?
- A. Yes, I recommend that the Commission direct the Company to provide reliable
 and accurate data that conforms to the categories of costs presented in ICC
 Staff Exhibit 3.0, Schedule 3.1. This cost data is essential because it represents
 the minimum level of cost detail necessary to prepare a cost of service study.
 Furthermore, in developing this cost data, the Company should be directed to
 show how all costs incurred on a system-wide basis are allocated to each
 individual water company.

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- Q. Do you have any further recommendation to the Commission concerning future UI proceedings?
- Yes, I recommend that the Commission not limit this directive to Apple Canyon only, but rather require UI to provide more complete, accurate cost data for all future rate cases by any of its Illinois affiliates. Staff has found that cost data problems are not limited to a single utility. Therefore, it is essential that UI be required to adopt a company-wide policy of upgrading its cost information.

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Q. Please explain the Company's present rate structure.

206 A. The Company's present rate structure consists of an Availability Charge for all 207 non-metered water customers and a Base monthly facility charge (based on meter size) and a single block Gallonage Charge for metered residential 208 customers. 209 210 211 Q. What alternative methodology do you propose to use for the development 212 of rates? 213 I propose to apply an across-the-board equal percentage increase to current Α. rates to meet the revenue requirement proposed by Staff witness Hathhorn's 214 revenue requirement. 215 216 Q. What is the justification for your proposed approach? 217 A. It is justified by the lack of accurate data to develop a cost-based alternative. As 218 previously noted, the Company has failed to provide the necessary information to 219 develop a cost of service study for this case. Thus, there is no cost foundation 220 221 for increasing one rate more or less than another. In the absence of such 222 support, the most equitable approach is to increase all rates (Availability, Facility, 223 and Gallonage) on an equal percentage basis, which is my proposal in this case. 224 225 Q. What specific charges for metered service have you developed based on your across-the-board approach? 226 Α. I have developed the set of charges presented in Schedule 3.2. These 227 228 recommended increases were based on applying an equal percentage increase

229 to existing charges to produce Staff's proposed revenue requirement net of the 230 revenues produced by miscellaneous charges. For the reasons discussed below 231 in Section III "Miscellaneous Tariff Issues" of my testimony, my miscellaneous 232 operating revenues differ from the miscellaneous operating revenues calculated 233 by the Company. 234 Did you prepare a typical bill comparison? 235 Q. 236 Yes, I did. It is attached as ICC Staff Exhibit 3.0, Schedule 3.3. 237 238 Q. If the Commission determines a revenue requirement other than that recommended by Staff, how do you recommend the rates be adjusted? 239 Α. I recommend that metered rates be adjusted on an equal percentage basis to 240 produce the revenues adopted by the Commission in this proceeding. That 241 would be consistent with Staff's overall rate design approach of raising rates on 242 243 an equal percentage basis. 244 III. MISCELLANEOUS TARIFF ISSUES 245 246 Q. Did the Company propose changes or updates to its current Rules, Regulations and Conditions of Service tariffs in its initial filing for this 247 case? 248 A. Yes. The Company has proposed to update its Rules, Regulations, and 249 250 Conditions of Service tariffs since they have not been updated in more than 12 251 years. (Ross, Direct Testimony, p. 8)

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Q. Do you agree with the Company's proposed Rules, Regulations, andConditions of Service tariffs?

I have reviewed the tariffs and agree with their content. However, on ILL. C.C.

No. 1, Original Sheet No. 26, Section 21 BILLS FOR WATER SERVICE: A. the tariff does not identify whether there will be monthly, bi-monthly, or quarterly billing. Additionally, on Ill. C.C. No. 1, First Revised Sheet No. 3 (Table of Contents) the Company has listed Page rather than Sheet No. on the upper left hand corner when identifying where to look. I propose that the Company include the correct billing period and change the reference from Page to Sheet Number when it files its final tariffs.

The Company's proposed Rules, Regulations, and Conditions of Service tariffs are identical to those accepted by the Commission in other Utilities, Inc. cases. Specifically, Westlake Utility, Inc. (Docket No. 01-0050), Lake Wildwood Utilities Company (Docket No. 01-0663).

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Q. What is the Company proposing with regard to its billing cycle?

The Company is proposing to move from a quarterly billing cycle to a monthly billing cycle. (Ross, Direct Testimony, pp. 7-8) Company witness Ross stated that a monthly billing cycle will enable the Company to provide better service to the customers. It will permit customers to properly budget for water utility expenses; allow Company representatives to address customer concerns with a

275 quicker response time; and allow the utility to locate and resolve system problems as customer billing and consumption data will be available monthly as 276 opposed to quarterly. (Ross, Direct Testimony, p. 8) 277 278 Do you agree with the Company's proposed move to monthly billing? Q. 279 Yes. This change from a quarterly billing cycle to a monthly billing cycle is Α. 280 281 beneficial to customers and the quality of their water service. In addition to the Company's listing of proposed benefits, in response to Staff data request WRJ 282 283 1.16, the Company gave an estimate of how much a typical bill would increase as a result of the conversion to a monthly billing cycle. According to the 284 285 Company the estimated cost per customer would be \$0.41 per month. However, no additional employees would be required to handle the increased number of 286 billings. (Ross, Direct Testimony, p. 8) Staff agrees that benefits resulting from 287 288 the proposed change to the monthly billing cycle justify the minimal additional 289 cost. 290 291 Q. Has the Company added any new language to its proposed tariffs? 292 A. Yes. The Company is proposing to add what they term a "Redistribution" section on their tariffs. (ILL.C.C. No. 1, Fourth Revised Sheet No. 1.1) The language 293

"If, at the request of and for the convenience of the owner of a premises

containing more than one dwelling unit, water is furnished to said premises

through a single meter for the purpose of redistribution to the several dwelling

units served through such single meter, the customer charge set forth on ILL.

C.C. No. 1, Sixth Revised Sheet No. 1, shall he multiplied by the number of

dwelling units served. The product thereof shall he the Customer Charge for

states:

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301 302 303		indicated above, and shall not mean resale of water by any customers."
304	Q.	Do you agree with the Company's proposal?
305	A.	No. The language implies that water service is provided through a single
306		meter, which I interpret to mean that one bill is sent to the owner and
307		therefore one customer charge is applied. I question why the customer
308		charge should be multiplied by the number of dwelling units if one bill is
309		sent. The Company incurs no additional costs since only one bill is sent,
310		one meter is installed, and only one service line is installed. In response
311		to WRJ 1.21, which states:
312 313 314 315 316 317 318 319 320 321 322		Answer the following questions with respect to proposed ILL. C. C. No. 1, Fifth Revised Sheet No. 1.1, Redistribution: Is more than one bill sent to such premises or is just one bill sent for all units to pay? Since there is only one meter serving the premise does that mean there is only one service line or are there more than one service lines? The Company responded: "Apple Canyon has not had to bill for redistribution, and therefore, has not addressed this issue."
324		is necessary to have this language for the Apple Canyon service area.
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326	Q.	Is the Company proposing any new miscellaneous charges for the Apple
327		Canyon service area?
328	A.	Yes. The Company is proposing a \$40 outside meter reader charge. (III.C.C. No
329		1, Fourth Revised Sheet No. 1.1)

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Q. Who would the \$40 outside meter reader charge apply to?

A. The charge would apply to any current or new customer who requests that an outside meter reader be installed.

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Q. Do you agree with the Company's proposal?

Yes. Staff recognizes that there must be a cost involved with the outside meter reader and currently a \$40 charge for outside meter reading is applicable in Utilities, Inc. Northern Hills Water & Sewer Company. The \$40 costing associated with the Northern Hills Water & Sewer Company was provided to Commission Staff in Docket No. 98-0045 and was approved by the Commission. (Response to Staff data request WRJ 1.11) Additionally, in a conversation with Company witness Ross it was agreed upon that two (2) outside meter reading billing units should be used for the test year in anticipation of outside meter requests. I have incorporated the two outside meter reading amounts (\$80) into Miscellaneous Revenues found on ICC Staff Exhibit 3.0, Schedule 3.2.

A.

Q. Are there other miscellaneous charges that you would like to address?

Yes. I propose a charge that is consistent to the extent possible with the corresponding miscellaneous charge for other Utilities, Inc. water and wastewater companies participating in the current round of rate proceedings. That proposal is a NSF Check Charge of \$10.

- Q. Please begin your discussion by explaining your proposed NSF Check
 Charge of \$10.
- 355 Α. The Company's current charge is \$7, which has been in effect since 1993 356 (Company Response to WRJ 1.29). However, as the Company itself recognizes 357 there has been inflation since 1993 and the proposed charge should be adjusted 358 accordingly (Id.). In addition, the Company states it would not object to a uniform 359 NSF check charge across UI operating companies (Id.). The Staff proposed \$10 360 charge recognizes the impact of inflation since 1993. Further, given that there is currently a \$10 NSF charge in effect for UI's Northern Hills Water & Sewer 361 362 Company that was approved by the Commission in Docket No. 98-0045, Staff's proposal is more consistent with current Commission practice. Finally, since this 363 same proposal is made for other UI companies, it will advance the goal of 364 uniformity. 365

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- Q. Please summarize what your recommendations are in this proceeding.
- A. I recommend the following:
 - 1. The Commission order the Company file new Rate, Rules, Regulations and Conditions of Service tariffs within ten (10) days of the Commission order, attached to Company witness Ross' direct testimony, with an effective date of not less than ten (10) business days after the date of filing, for service rendered on and after their effective date, with individual tariff sheets to be corrected within that time period if necessary.

The Commission order the Company to provide reliable and accurate 2. 375 data that conforms to the categories of costs presented in ICC Staff 376 Exhibit 3.0, Schedule 3.1, and that UI be required to adopt a company-377 wide policy of upgrading its cost information. 378 379 Does this conclude your direct testimony? Q. 380 Yes, it does. A. 381

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INTANGIBLE PLANT	
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PUMPING PLANT	
WATER TREATMENT PLANT	
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Apple Canyon Utility Company
Docket No. 03-0399
ICC Staff Exhibit 3.0
Schedule 3.2

RATE DESIGN ANALYSIS

APPLE CANYON UTILITY COMPANY TYPICAL RESIDENTIAL BILL COMPARISON

Docket No. 03-0399 ICC Staff Exhibit 3.0 Schedule 3.3

LINE NO.	FACILITIES CHARGE	CURRENT \$5.00	COMPANY PROPOSED \$13.50	STAFF PROPOSED \$5.61
2	GALLONAGE CHARGE (PER 1,000 GALLONS)	\$4.23	\$5.00	\$4.75

	USAGE 1,000 GALLONS (A)	CURRENT MONTHLY BILL (B)	COMPANY PROPOSED MONTHLY BILL (C)	DOLLAR INCREASE (D)	PERCENT INCREASE (E)	STAFF PROPOSED MONTHLY BILL (F)	DOLLAR INCREASE (G)	PERCENT INCREASE (F)
3	1 1	\$9.23	\$18.50	\$9.27	100.4%	\$10.36	\$1.13	12.2%
4*	2	\$13.46	\$23.50	\$10.04	74.6%	\$15.11	\$1.65	12.3%
5	3	\$17.69	\$28.50	\$10.81	61.1%	\$19.86	\$2.17	12.3%
6	6	\$30.38	\$43.50	\$13.12	43.2%	\$34.11	\$3.73	12.3%
7	9	\$43.07	\$58.50	\$15.43	35.8%	\$48.36	\$5.29	12.3%

	AVAILABILITY							
8	CUSTOMER	\$5.00	\$7.15	\$2.15	43.0%	\$5.61	\$0.61	12.2%

Notes

^{*} Typical monthly residential usage